

1 TOMIO B. NARITA (SBN 156576)
2 JEFFREY A. TOPOR (SBN 195545)
3 SIMMONDS & NARITA LLP
4 44 Montgomery Street, Suite 3010
5 San Francisco, CA 94104-4816
6 Telephone: (415) 283-1000
7 Facsimile: (415) 352-2625
8 tnarita@snllp.com
9 jtopor@snllp.com

10 Attorneys for defendant
11 Asset Acceptance, LLC

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 JOHNNY WANG, an individual, on
16 his own behalf and on behalf of all
17 others similarly situated,

18 Plaintiff,

19 vs.

20 ASSET ACCEPTANCE, LLC, a
21 Delaware limited liability company,
22 and DOES 1-100, inclusive,

23 Defendants.
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27
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CASE NO.: C09-04797 SI

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CERTAIN
PRETRIAL DEADLINES**

1 WHEREAS the parties participated in a judicial settlement conference in this
2 matter with Magistrate Judge Edward M. Chen on March 24, 2011, and

3 WHEREAS the parties are continuing their efforts to settle the matter, and
4 Judge Chen has directed all parties to return for a further judicial settlement
5 conference on April 28, 2011, and

6 WHEREAS the Court currently has a Case Management Conference set in
7 this action on April 8, 2011, and

8 WHEREAS under the current Scheduling Order, the plaintiff must file his
9 motion for class certification on or before April 18, 2011, and

10 WHEREAS the parties desire to continue to focus their efforts on exploring
11 a potential settlement of this matter, and the settlement process can be facilitated if
12 the date for the Case Management Conference, and the deadlines relating to the
13 motion for class certification are vacated,

14 THEREFORE, the parties hereby stipulate and jointly request the Court to
15 issue an order 1) vacating the Case Management Conference and vacating the
16 briefing schedule relating to the motion for class certification, 2) resetting the
17 deadline to file the motion for class certification to June 20, 2011, and 3) resetting
18 the date for the Case Management Conference to a date in July 2011 or later that is
19 convenient for the Court.

20
21 Dated: March 29, 2011

PRESTON LAW OFFICES
ETHAN PRESTON

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24 By: s/Ethan Preston
25 Ethan Preston
26 Attorneys for plaintiff
27 Johnny Wang
28

1 Dated: March 29, 2011

SCHUCKIT & ASSOCIATES, P.C.
KAREN B. REISINGER

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4 By: s/Robert J. Schuckit
Robert J. Schuckit
Attorneys for defendant
5 Trans Union, LLC

6 Dated: March 29, 2011

SIMMONDS & NARITA LLP
TOMIO B. NARITA

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9 By: s/Tomio B. Narita
Tomio B. Narita
Attorneys for defendant
10 Asset Acceptance, LLC
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12 **[PROPOSED] ORDER**

13 Having reviewed the Stipulation of the parties, and good cause appearing, it
14 is hereby ORDERED as follows:

15 1. The Case Management Conference in this matter set for April 8, 2011 is
16 hereby VACATED.

17 2. The briefing schedule relating to the motion for class certification is
& notice
18 hereby VACATED. Plaintiff must file his motion for class certification on or
19 before June 20, 2011, and the Court will establish a hearing date and briefing
20 schedule for the motion at that time.

21 3. The Case Management Conference for this case will proceed on
22 7/29/11
23 @ 3 p.m.

24 DATED: _____

25
26 By: _____

27 Hon. Susan Illston
28 United States District Judge